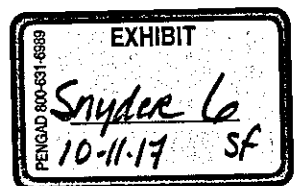


# **Exhibit 290**

## **(Filed Under Seal)**

# Exhibit 12



IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE NAMENDA DIRECT PURCHASER  
ANTITRUST LITIGATION

Case No. 1:15-CV-07488-CM-JCF

**DECLARATION OF JULIE SNYDER**

I, Julie Snyder, hereby declare as follows:

1. I am currently the Executive Director of Neurology Marketing at Allergan plc.
2. Beginning in 2014, I was Senior Product Director at Forest Laboratories, Inc. ("Forest") during which time I was the brand manager for the Namenda franchise, including Namenda® ("Namenda IR"), Namenda XR®, and Namzaric. In April 2015, I transitioned to Executive Director of Marketing for Actavis plc (n/k/a Allergan plc).
3. It is my understanding that in December 2014 a federal court entered an injunction which prohibited Forest from withdrawing Namenda IR from the market or limiting its distribution. Forest was also required to notify healthcare providers, pharmacists, patients, caregivers, and health plans of the injunction in the same or substantially similar manner as the February 2014 withdrawal announcement. Forest fully complied with this directive.
4. To comply with the injunction, Forest compiled all of the communications sent as part of its February 2014 announcement in order to ensure that the list of individuals and entities who received the announcement of the injunction mirrored those who received the February 2014 announcement.

5. Forest sent caregivers, health care providers, long term care facilities, pharmacists, and health plans over 900,000 communications alerting them of the injunction and the continued availability of Namenda IR. These communications consisted of letter mailings and emails directly from Forest or through partner websites such as Caring.com. This effort mirrored the communications made in February 2014 announcing the withdrawal. Forest also updated its website for Namenda IR and Namenda XR® to include a banner message which alerted the website visitor of the court order, and continued availability of Namenda IR, in a similar manner to the website announcements of the planned withdrawal in February 2014. Forest also issued a press release regarding the injunction, which was published on various websites, again mimicking the February 2014 website announcements.

6. In short, Forest engaged in a substantial and far-reaching marketing communications effort to fully inform the market of the continued availability of Namenda IR in compliance with the injunction.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6th day of October, 2017, in Parsippany, New Jersey.

  
Julie Snyder

